

Before the
POSTAL REGULATORY COMMISSION
Washington, DC 20268-0001

Mail Processing Network	:	
Rationalization Service	:	Docket No. N2012-1
Changes, 2012	:	

GREETING CARD ASSOCIATION RESPONSE TO PUBLIC
REPRESENTATIVE'S NOTICE OF PROPOSED PROCEDURAL SCHEDULE

The Greeting Card Association (GCA) responds in this filing to the Public Representative's January 5, 2012, Notice of Proposed Procedural Schedule. GCA is largely in agreement with the position taken in the Public Representative's request, as further explained below, and urges that it be granted.

Need for a technical conference. With respect to the challenges presented by Postal Service witness Rosenberg's testimony and library references, GCA had already arrived at approximately the same conclusions as expressed by the Public Representative. We fully support the request that such conference(s) be provided for. GCA has also participated in discussions with the Postal Service to establish a mutually acceptable schedule.

Initial discovery. GCA fully agrees with the Public Representative's suggestion (Notice, p. 3) of an initial discovery period of 45 days from the issuance of the procedural schedule. GCA has also begun discovery, and anticipates filing substantially more interrogatories and requests as we work through the materials provided with the Postal Service's initial filing.

Rebuttal discovery. While not yet in a position to know whether it will need to file rebuttal testimony, GCA considers the Public Representative's proposal of 60 days (at least) from the end of hearings on the Postal Service case to be a

reasonable and appropriate one, given the complexity of the issues presented in this Docket.

Accordingly, GCA believes that the Public Representative's motion should be granted.

January 9, 2012

Respectfully submitted,

GREETING CARD ASSOCIATION

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